

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

BROAD-BUSSEL FAMILY LIMITED
PARTNERSHIP, MARIE LOUISE
MICHELSON, MICHELLE MICHELSON,
and HERBERT BLAINE LAWSON, JR.,
Individually and on Behalf of All Other
Persons and Entities Similarly Situated,

Plaintiffs,

vs.

BAYOU GROUP LLC,
BAYOU MANAGEMENT LLC,
BAYOU FUND, LLC,
BAYOU SUPER FUND, LLC,
BAYOU NO LEVERAGE FUND LLC,
BAYOU AFFILIATES FUNDS, LLC,
BAYOU ACCREDITED FUND, LLC,
BAYOU OFFSHORE FUND, LLC,
BAYOU PARTNERS LLC,
BAYOU SECURITIES LLC,
BAYOU SECURITIES, LTD,
BAYOU ADVISORS, LLC,
BAYOU EQUITIES, LLC,
IM PARTNERS, IMG, LLC
SAMUEL ISRAEL, III, DANIEL E. MARINO,
RICHMOND-FAIRFIELD ASSOCIATES,
CPA, PLLC, JAMES G. MARQUEZ,
JEFFREY D. FOTTA, EQYTY RESEARCH
AND MANAGEMENT, LLC,
EQYTY RESEARCH AND MANAGEMENT LTD,
CITIBANK N.A.,
HENNESSEE GROUP LLC,
ELIZABETH LEE HENNESSEE,
CHARLES J. GRANDANTE, and
STERLING STAMOS CAPITAL
MANAGEMENT, L.P.,

Defendants.

CASE NUMBER:
3:05 CV 1762 (JBA)

December 8, 2005

**MOTION TO ADMIT
FOREIGN COUNSEL PRO HAC VICE**

In accordance with D. CONN. L. CIV. R. 83.1(d), the undersigned attorney, duly admitted to practice before this Court, hereby moves that Sung-Hee Suh, Esq., be permitted to represent defendant Sterling Stamos Capital Management, L.P. in the above-captioned action for all matters related to this case, in addition to counsel of record who have already appeared for the defendant. Sung-Hee Suh, Esq., is an attorney admitted to practice before the state court of New York, the United States District Courts for the Southern and Eastern Districts of New York and the United States Court of Appeals for the Second Circuit. In support of this motion, the undersigned states:

1. Sung-Hee Suh, Esq., is a member of the law firm of Schulte Roth & Zabel LLP, 919 Third Avenue, New York, New York, 10022.

2. An affidavit setting forth the necessary information regarding the qualifications of Sung-Hee Suh, Esq., to practice before this Court along with such other information required by D. CONN. L. CIV. R. 83.1(d) is attached hereto as Exhibit A and made a part hereof.

3. The undersigned has agreed to act as local counsel for Sterling Stamos Capital Management, L.P. in this proceeding and, as such, agrees to be the Connecticut recipient of all pleadings and communications on behalf of defendant Sterling Stamos Capital Management, L.P. All pleadings and communications may be sent to Patrick J. McHugh at the following address and telephone number:

Patrick J. McHugh(ct14072)
Finn Dixon & Herling LLP
One Landmark Square
Suite 1400
Stamford, CT 06901
Telephone (203) 325-5000
Facsimile (203) 348-5777
E-mail pmchugh@fdh.com

11/12/06

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

BROAD-BUSSEL FAMILY LIMITED)
PARTNERSHIP, MARIE LOUISE)
MICHELSON, MICHELLE MICHELSON)
and HERBERT BLAINE LAWSON, JR.,)
Individually and on Behalf of All Other)
Persons and Entries Similarly Situated)

Case No. 305CV1762 (JBA)

Plaintiffs,)

vs.)

BAYOU GROUP LLC, BAYOU)
MANAGEMENT LLC, BAYOU FUND, LLC,)
BAYOU SUPER FUND, LLC, BAYOU)
NO LEVERAGE FUND LLC, BAYOU)
AFFILIATES FUNDS, LLC, BAYOU)
ACCREDITED FUND, LLC, BAYOU)
OFFSHORE FUND, LLC, BAYOU PARTNERS)
LLC, BAYOU SECURITIES LLC, BAYOU)
SECURITIES, LTD, BAYOU ADVISORS, LLC,)
BAYOU EQUITIES, LLC, IM PARTNERS,)
IMG, LLC, SAMUEL ISRAEL, III, DANIEL E.)
MARINO, RICHMOND-FAIRFIELD)
ASSOCIATES, CPA, PLLC, JAMES G.)
MARQUEZ, JEFFREY D. FOTTA, EQYTY)
RESEARCH AND MANAGEMENT, LLC,)
EQYTY RESEARCH AND MANAGEMENT)
LTD, CITIBANK N.A., HENNESSEE GROUP)
LLC, ELIZABETH LEE HENNESSEE,)
CHARLES J. GRADANTE, and STERLING)
STAMOS CAPITAL MANAGEMENT, L.P.,)

Defendants.)

December 6, 2005

**AFFIDAVIT IN SUPPORT OF MOTION
FOR PERMISSION TO APPEAR *PRO HAC VICE***

STATE OF NEW YORK)
)
COUNTY OF NEW YORK)

ss.: Manhattan

SUNG-HEE SUH, being duly sworn, hereby deposes and says:

1. I am over the age of eighteen (18) years and I understand the nature and obligations of an oath.

2. I am a member of the law firm of Schulte Roth & Zabel LLP and may be reached through the following contact information:

Sung-Hee Suh, Esq.
Schulte Roth & Zabel LLP
919 Third Avenue
New York, NY 10022
Telephone: (212) 756-2000
Fax: (212) 593-5955
E-mail: Sung-Hee.Suh@srz.com

3. I submit this affidavit in support of a motion to be admitted to practice before this Court in the above-captioned matter as a visiting attorney *pro hac vice* pursuant to D. CONN. L. Civ. R. 83.1(d).

4. I am a member in good standing of the bar of the State of New York. I am also admitted and in good standing in the United States District Courts for the Southern and Eastern Districts of New York, and the United States Court of Appeals for the Second Circuit.

5. I have not been denied admission or disciplined by this Court or any other Court.

6. I have fully reviewed and I am familiar with the Rules of the United States District Court for the District of Connecticut.


7. The granting of this motion will not require modification of any scheduling order entered by this Court pursuant to FED. R. CIV. P. 16(b) or the standing order on scheduling in civil cases.

8. I have requested that Patrick J. McHugh, Esq., of the firm of Finn Dixon & Herling LLP, One Landmark Square, Stamford, Connecticut 06901-2689, act as local counsel,

and I understand that he will be receiving service of papers and communications in this matter with me on behalf of defendant Sterling Stamos Capital Management, L.P.


Sung-Hee Suh

Subscribed and sworn to
before me this 6th day of
December, 2005

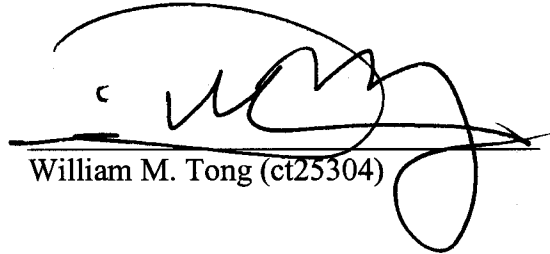

Notary Public
My Commission expires:

VIRGINIA PFISTER VILLARDI
Notary Public, State of New York
No. 014948829
Qualified in Queens County
Commission Expires May 23, 2007

CERTIFICATION

This is to certify that a true and correct copy of the foregoing was delivered by United States mail, postage prepaid to the following this 8th day of December, 2005:

William M. Bloss
Koskoff, Koskoff & Bieder, P.C.
350 Fairfield Ave.
Bridgeport, CT 06604



William M. Tong (ct25304)